

## **EXHIBIT J**

### **Designation of Deposition Testimony of Ramesh Shukla**

RAMESH C. SHUKLA  
July 9, 2014

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1                   UNITED STATES DISTRICT COURT  
2                   EASTERN DISTRICT OF MICHIGAN  
3                   SOUTHERN DIVISION

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6     In re:    )     Case No. 13-53845

7     CITY OF DETROIT, MICHIGAN )

8    )     Chapter 9

9     Debtor    )

10    )     Hon. Steven W. Rhodes

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13                   The Deposition of RAMESH C. SHUKLA,

14                   Taken at 150 W. Jefferson Avenue, Suite 2500,

15                   Detroit, Michigan,

16                   Commencing at 1:25 p.m.,

17                   Wednesday, July 9, 2014,

18                   Before Melinda S. Moore, CSR-2258.

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1           County purchase of the interceptor system?

2   A.   I was not involved in the negotiation with Oakland  
3           Macomb, if you're talking OMTD.  Is that what  
4           you're talking about?

5   Q.   Either Oakland County's purchase or acquisition  
6           of the interceptors or Macomb's.

7   A.   No.  I did attend some meetings which were called  
8           for, and my role specifically was related to the  
9           sewer station we have on 8 Mile Road.  My input  
10          was needed for those things.  So I attended some  
11          of those meetings, but I was not involved in the  
12          overall project or overall agreement that Macomb  
13          County and DWSD agreed to.

14   Q.   Do you remember when you first learned that there  
15          was a criminal investigation of contracts that  
16          were let by the DWSD?

17   A.   Please explain that question again.  Contract that  
18          was let by DWSD?

19   Q.   When did you first become aware that there was a  
20          criminal investigation of any DWSD contract?

21   A.   Any DWSD contract?

22   Q.   Any.

23   A.   Criminal investigation by who?

24   Q.   By any law enforcement agency that was  
25          investigating the -- any illegal practice in the

1 Detroit Water and Sewerage Department or with  
2 respect to any contract that it had entered into  
3 with a contractor.

4 A. I remember that I was contacted by FBI sometime in  
5 2008 -- October or November of 2008, that they  
6 want -- they left a message on my office phone  
7 saying that they want to come and talk to me, so I  
8 called them back and they came back and talked to  
9 me.

10 Q. What did they talk to you about?

11 A. Basically they were talking about the various  
12 contracts that we are doing, and was --  
13 specifically the thrust was did Ferguson -- was  
14 Ferguson -- how do I put it? Did Ferguson take  
15 advantage of his position with the mayor's office  
16 to get contracts from City of Detroit DWSD.

17 That's what they were trying to talk to me about.

18 Q. Was 1368, Amendments 2, 3, 4, 5 the subject of  
19 any of the discussions?

20 A. I don't remember if they talked -- at that  
21 particular time in 2008 if they talked  
22 specifically of any amendment, but they did talk  
23 about the sinkhole, yes. That was talked about.

24 Q. Do you remember what they asked you about the  
25 sinkhole project?

1 A. Same issue, that did Ferguson use his position to  
2 get himself on the contract, who appointed him and  
3 all that, how did they get on the job and all that  
4 kind of questions. And I told them I didn't hire  
5 him, it was a decision of CS-1368 contractor. My  
6 job was to make sure that the work gets done.  
7 That's what my job was.

8 Q. Were you -- was Victor Mercado on site at the  
9 sinkhole every day that you were on site?

10 A. Mr. Mercado was on the sinkhole every day till the  
11 bypass was done and the houses were secure on  
12 either side of the sinkhole, mainly on the south  
13 side. He was there every day in every meeting.

14 Q. When do you think that work was done?

15 A. That was -- I don't remember the exact dates and  
16 all that. It was sometime end of September/early  
17 October, around that time.

18 Q. Why is it, to the best of your knowledge, that  
19 Mr. Mercado stopped being on site every day after  
20 that?

21 A. I don't know exactly reason why he stopped, but  
22 then his number two guy, my boss -- direct boss,  
23 Gary Fujita -- Gary was there every day and day in  
24 and out like me almost till January until we  
25 stabilized the sinkhole. So he was there every

1 A. No, they told me that I was not the target of the  
2 investigation. They were trying to take my  
3 deposition for whatever they were investigating.  
4 I was specifically told that I was not the target  
5 of the investigation.

6 Q. Were you told who was the target of the  
7 investigation?

8 A. The first agent who called me sometime in 2008,  
9 they said the same thing, and then the other  
10 agents who I talked to when I talked to them in  
11 our office -- not my office, but in the DWSD  
12 office or their building those agents.

13 Q. They said someone different?

14 A. Pardon me?

15 Q. They told you there were different targets?

16 A. All of them told me I was not a target of the  
17 investigation. All of them.

18 Q. Okay. My question was: Did they ever tell you  
19 who the target was?

20 A. They never told me who the target was, no.

21 Q. Did they ask you questions about Mr. Mercado?

22 A. Yeah, they did ask me some kind of questions about  
23 Mr. Mercado.

24 Q. Were you aware of anybody else at DWSD who had  
25 been speaking with law enforcement or received a

1 subpoena to speak with them?

2 A. I believe they talked to a lot of people in my  
3 department and in other departments.

4 Q. Who do you know of from your department?

5 A. I know they talked to Darryl Latimer, if I  
6 remember right, contracts and grants manager. I'm  
7 pretty sure they talked to Gary Fujita, the  
8 director. They talked to one of my head engineers,  
9 Dennis Green; they talked to him. He was under  
10 me. They talked to some of my inspectors. I  
11 don't remember all the names. They talked to a  
12 lot of people.

13 Q. When did you first become aware of Macomb  
14 County's discussions with Detroit about  
15 purchasing the Macomb interceptor system?

16 A. I don't remember the date. I was aware of that  
17 that they're going to purchase that. I don't  
18 remember the date.

19 Q. Do you remember the year?

20 A. I don't remember the year also. I don't want to  
21 guess on that.

22 Q. Do you know if it was something that was  
23 negotiated over several years or something  
24 negotiated within one year?

25 A. I don't know exactly how many years it took, but

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July 9, 2014

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1 CERTIFICATE OF NOTARY

2 STATE OF MICHIGAN )  
3 ) SS  
4 COUNTY OF MACOMB )

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6 I, MELINDA S. MOORE, certify that this  
7 deposition was taken before me on the date  
8 hereinbefore set forth; that the foregoing  
9 questions and answers were recorded by me  
10 stenographically and reduced to computer  
11 transcription; that this is a true, full and  
12 correct transcript of my stenographic notes so  
13 taken; and that I am not related to, nor of  
14 counsel to, either party nor interested in the  
15 event of this cause.

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22 MELINDA S. MOORE, CSR-2258

23 Notary Public,

24 Macomb County, Michigan

25 My Commission expires: September 6, 2016

A circular notary seal impression. The outer ring contains the text "NOTARY PUBLIC" at the top and "MICHIGAN" at the bottom. The center of the seal features a stylized design.